## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA DANVILLE DIVISION

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
v.	)	Criminal No. 4:18-CR-00011
ASHLEY TIANA ROSS,	)	
Defendant.	)	

## NOTICE OF ASHLEY ROSS' JOINDER IN RESPONSES AND MOTIONS IN LIMINE

Comes now the Defendant, Ashley Tiana Ross, by counsel, and:

- 1. Joins Dashaun Trent's Motion for Bill of Particulars and Other Relief in re: Matthew Ferguson (ECF No. 716);
- Joins Shabba Chandler's Motion in Limine to Exclude Witness Testimony (ECF No.
   714);
- 3. Joins Dashaun Trent's Response to Opposition to the Government's Notice of Intent to Introduce Rule 404(b) Evidence (ECF No. 717 *[in response to ECF 651]*, and, in further support, Ross adds that she like Dashaun Trent is not charged with any gun related offense during or as a result of the November 2, 2016 "consensual encounter" referenced in Trent's Response. ECF No. 717, at 5 ¶7;
- 4. Joins Marcus Davis' Response in Opposition to the Government's Notice of Intent to Introduce Rule 404(b) Evidence (ECF No. 718 [in response to ECF 651]);
- 5. Joins Kanas Trent's Response to the Government's Motion in Limine to Preclude Improper Character Evidence (ECF No. 709 [in response to ECF's 654 and 656]);
- 6. Joins Dashaun Trent's Response to the Government's Motion in Limine Regarding References to Potential Sentences (ECF No. 666 *[in response to ECF 656]*);

- 7. Joins Kanas Trent's Motion in Limine to Redact Certificates of Analysis Re: Cartridge Casing Associations with Unrelated Danville Criminal Investigations (ECF No. 661);
  - 8. Joins Kanas Trent's Motion in Limine to Redact Names on Exhibits (ECF No. 650);
- 9. Joins Dashaun Trent's Partial Objections to Government's Proposed Jury Instructions and Motion to Enlarge Time to Response Further to Proposed Instructions (ECF No. 720).

Respectfully submitted,

**ASHLEY TIANA ROSS** 

By <u>/s/Terry N. Grimes</u> Of Counsel

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## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system, and that a true and accurate copy of the foregoing was sent via the CM/ECF system to all counsel of record, on the 9<sup>th</sup> day of September, 2019.

/s/ Terry N. Grimes
Terry N. Grimes